

Exhibit LL

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
5 AND IRBESARTAN PRODUCTS

5 LIABILITY LITIGATION Civil No.
6 ***** 19-2875

6 ***** (RBK/JS)
7 THIS DOCUMENT APPLIES TO ALL

7 CASES HON ROBERT B.
8 KUGLER

8 *****

9 - CONFIDENTIAL INFORMATION -
10 SUBJECT TO PROTECTIVE ORDER

11
12 Remote Videotaped via Zoom
13 Deposition of MI (KAREN) XU, commencing at
14 7:02 a.m. China Standard Time, on the 21st of
15 May, 2021, before Maureen O'Connor Pollard,
16 Registered Diplomate Reporter, Realtime
17 Systems Administrator, Certified Shorthand
18 Reporter.

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22 GOLKOW LITIGATION SERVICES
23 877.370.3377 ph | 917.591.5672 fax
24 deps@golkow.com

1 the authorities was necessary.

2 BY MS. HILTON:

3 Q. If we look at number 5, and
4 number 5 appears to discuss potential
5 compensation, or, as you would refer to it,
6 settlement, and it refers to someone named
7 "Discuss with Chen & Chen."

8 To the best of your knowledge,
9 who are Chen & Chen when used as such?

10 A. I'm not sure. That is because
11 I can't even confirm who generated this
12 document.

13 Judging by the choice of words
14 and the format of this document, I can tell
15 that it is a draft, an unofficial document;
16 therefore, I am afraid I cannot respond to
17 your question.

18 Q. So you don't know if "Chen &
19 Chen" refers to Baohua Chen, the president of
20 the company?

21 MS. BONNER: Objection.

22 A. At least judging from the
23 context, I cannot draw such a conclusion.

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